

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: September 12, 2024 at 1:00 p.m. (ET)
Objection Deadline: August 12, 2024 at 4:00 p.m. (ET)

Ref. Nos. 19176, 19185 & 28906

**SUPPLEMENTAL CERTIFICATION OF COUNSEL REGARDING DEBTORS' FIFTY-SIXTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED
AND/OR UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Kimberly A. Brown, counsel to FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. On July 1, 2024, the debtors and debtors-in-possession (the “Debtors”) filed the *Debtors’ Fifty-Sixth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)* [D.I. 19176, sealed & 19185, redacted] (the “Objection”).

2. On December 19, 2024, the Debtors filed a revised proposed form of order (the “Revised Order”), for the Objection under Certification of Counsel [D.I. 28906].

3. Based on an ongoing review of its books and records, the FTX Recovery Trust has further revised the Revised Order (the “Further Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect agreement with counsel to the holder of claim number 60437 and counsel

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

to the holder of claim number 68465. A copy of the Further Revised Order compared against the Revised Order attached to the Objection is attached hereto as **Exhibit B**. In accordance with the Court's electronic order processing procedures, a clean copy of the Further Revised Order shall be uploaded to CM/ECF.

4. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Further Revised Order at its earliest convenience.

Dated: March 2, 2025
Wilmington, Delaware

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